

UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

Thurgood Marshall U.S. Courthouse 40 Foley Square, New York, NY 10007 Telephone: 212-857-8500

MOTION INFORMATION STATEMENT

Docket Number(s): 19-1540-cv

Caption [use short title]

Motion for: Motion to Intervene & Unseal Judicial
Records

DONALD J. TRUMP, et al.

v.

DEUTSCHE BANK AG, et al.

Set forth below precise, complete statement of relief sought:

The Media Coalition seeks to intervene for the limited
purpose of enforcing the public's First Amendment
and common law rights of access to judicial records and
to unseal the names currently redacted in Deutsche
Bank's August 27, 2019 Letter to the Clerk (Dkt. 161).

MOVING PARTY: See attached Addendum

OPPOSING PARTY: See Certification in supporting memorandum

☐ Plaintiff☐ Defendant☐ Appellant/Petitioner☐ Appellee/Respondent

MOVING ATTORNEY: Jacquelyn N. Schell

OPPOSING ATTORNEY:

[name of attorney, with firm, address, phone number and e-mail]

BALLARD SPAHR LLP

1675 Broadway, 19th Floor

New York, NY 10019

Court- Judge/ Agency appealed from: Southern District of New York - Ramos, J.

Please check appropriate boxes:

Has movant notified opposing counsel (required by Local Rule 27.1):

☒ Yes ☐ No (explain):FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND
INJUNCTIONS PENDING APPEAL:

Has this request for relief been made below?

☐ Yes ☐ No

Has this relief been previously sought in this court?

☐ Yes ☐ No

Requested return date and explanation of emergency:

** Opposing counsel's position on motion:

☐ Unopposed ☒ Opposed ☐ Don't Know

Does opposing counsel intend to file a response:

☐ Yes ☐ No ☒ Don't Know

Is oral argument on motion requested?

☐ Yes ☒ No (requests for oral argument will not necessarily be granted)

Has argument date of appeal been set?

☒ Yes ☐ No If yes, enter date: August 23, 2019

Signature of Moving Attorney:

/s/ Jacquelyn N. Schell

Date: 9/11/2019

Service by: ☒ CM/ECF ☐ Other [Attach proof of service]

**See Certification in supporting memorandum

ADDENDUM

Moving Intervenor:

The Associated Press,

Cable News Network, Inc.,

The New York Times Co.,

POLITICO LLC and

WP Co., LLC, d/b/a the Washington Post